

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON WAVE 2 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
REGARDING DR. JUAN C. FELIX, M.D. FOR WAVE 2**

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Dr. Juan C. Felix, M.D. for Ethicon Wave 1, Dkt. #2184. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 8, 2016

Respectfully submitted,

/s/ David B. Thomas  
David B. Thomas (W.Va. Bar #3731)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
dthomas@tcspllc.com

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)

Thomas Combs & Spann, PLLC

300 Summers Street, Suite 1380

P.O. Box 3824

Charleston, WV 25338-3824

(304) 414-1800

dthomas@tcspllc.com